

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested. Currently, claims 12-30 are pending in this application.

Rejections Under 35 U.S.C. §103:

Claims 12-14 and 17-22 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Leung (U.S. '605) in view of Doviak et al (U.S. 2003/0017845, hereinafter "Doviak"). Applicant respectfully traverses this rejection.

In order to establish a *prima facie* case of obviousness, all of the claim limitations must be taught or suggested by the prior art. The combination of Leung and Doviak fails to teach or suggest all of the claim limitations. For example, the combination fails to teach or suggest "adapting a presentational form of the complete message to another presentational form compatible with the retrieved characteristics of the data network, and disassembling the adapted message into data packets and sending the disassembled data packets to the mobile user," as required by independent claim 12. Independent claims 19, 21 and 22 require similar (but not necessarily identical) features.

Page 2 of the Office Action states, *inter alia*, "Leung discloses a method of routing communications data to a mobile user located in one of a plurality of data networks by a router, the router having a data store provided with data relating to characteristics of the networks and the associations between the networks, (Col 5

lines 40-56, Figure 1A: item 6).” However, this portion of Leung fails to teach or suggest a router storing data relating to network characteristics. Indeed, item 6 illustrated in Fig. 1A is a mobile terminal, not a router.

Page 3 of the Office Action admits that Leung “fails to disclose storing associated characteristics of the network to which the user is connected, and adapting the complete message to be compatible with another presentation form and sending it to the mobile user.”

Doviak fails to remedy the admitted deficiencies of Leung. Rather than adapting a presentational form of a message to another presentation form as claimed, Doviak merely teaches adapting transmission protocols (i.e., transmission formats) of data being passed between dissimilar systems. For example, paragraph [0011] (specifically identified in the Office Action) of Doviak states, *inter alia*, the following (emphasis added):

Dissimilar networks may be connected by gateways which are devices that interconnect two or more dissimilar networks. A gateway differs from a router in that the endpoint terminal devices may implement a **dissimilar or incompatible protocols**. Gateways often perform specific **protocol conversions** at the layers above the network layer to move data from one type of network to another. In this regard, the Open Systems Interconnection (OSI) model includes seven "layers" to provide communications between heterogeneous (i.e., incompatible) systems.

As further examples that the Doviak discloses adapting protocols under which data is transmitted rather than adapting presentation formats as claimed,

paragraph [0023] discloses, *inter alia*, “The remote data conversion means converts the transported data between a remote device **transmission format** utilized by the remote device and a wireless link **transmission format** utilized by the wireless communications link (emphasis added),” and paragraph [0025] states, *inter alia*, “transporting the transported data over the wireless communication in accordance with the wireless link transmission format, the wireless link **transmission format and the host network format being incompatible** (emphasis added).” Moreover, pg. 22, left column to right column, states “A method of end-to end data communications where data is transported via **incompatible transmission formats** in a transparent manner between a remote device and a host communication network...(emphasis added).”

Paragraph [0217] (also specifically identified by the Office Action) discloses a “protocol independent” layer between the applications and the networking functions. This suggests that the application on the terminal will operate in a manner independent of the underlying network, not that presentation is being adapted to the type of terminal. As discussed in detail above, Doviak relates to adapting transmission protocols, not presentational format. Doviak’s process is said to be “transparent” to the user (see, e.g., paragraphs [0031] and [0072] in Doviak), and thus the user will not be aware of any differences imposed on the data between its transmission and reception. Accordingly, Doviak’s process/system has nothing to do with changing to a **presentation** format for the

user. Paragraph [0217] appears to merely describe the process by which data is converted from the transmission protocol to the presentation format. There is no teaching or suggestion that the presentation format might be different than the original presentation format (i.e., the presentation format in which the originator generated data).

Claims 15, 27 and 30 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Leung, Doviak in view of Penzias (U.S. '738). Claims 16, 23-26 and 28-29 were rejected under 35 U.S.C. §103 as allegedly being unpatentable over Leung, Doviak in view of Kikinis (U.S. '410). Neither Penzias nor Kikinis resolves the above described deficiencies of Leung and Doviak. Accordingly, Applicant respectfully requests that the above rejections under 35 U.S.C. §103 be withdrawn.

RAI et al.
Application No. 09/936,301
November 14, 2006

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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By: _____



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